UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION, et al.,

Plaintiffs,

v.

FEDERAL BUREAU OF INVESTIGATION, et al.,

Defendants.

Civil Action No. 1:05-cv-1004 (ESH)

Judge Ellen S. Huvelle

DECLARATION OF JENNIFER EGAN IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

I, Jennifer Egan, of Brooklyn, New York, do declare:

- 1. I am a Media Relations Liaison for the American Civil Liberties Union (ACLU) in New York, New York.
- 2. One of my job functions as Media Relations Liaison is to identify and collect press coverage of ACLU cases.
- 3. In December 2005, the ACLU released to the media some of the documents it received as a result of the Freedom of Information Act Request that is the subject of the above-entitled matter.
- 4. After the document release, I compiled news articles and transcripts representing some of the prominent media coverage of the documents released. A copy of this compilation is attached to this declaration as Exhibit A.

- 5. At the beginning of the compilation is a list of the materials compiled. As this summary list reflects, the ACLU document release received coverage in more than sixty media outlets around the country.
- 6. Another of my job functions as Media Relations Liaison is to help educate the public about important civil rights and civil liberties issues.
- 7. In March 2006, I helped coordinate the ACLU's effort to educate the public about recently released FBI documents reflecting the FBI's investigation of the Thomas Merton Center in Pittsburgh, Pennsylvania. Copies of two of these documents are attached to this declaration as Exhibit B.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 16th day of March, 2006.

Jennifer Egan